

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M. Williams,  
Magistrate Judge

Honorable Thomas Vanaskie  
(Ret.), Special Discovery Master

**NOTICE OF THE ZHP PARTIES' OBJECTION TO SPECIAL MASTER  
ORDER NO. 28 PURSUANT TO FED. R. CIV. P. 53(f)**

**PLEASE TAKE NOTICE** that on July 13, 2021, the ZHP Parties, by and through their undersigned counsel, shall move for the entry of an Order to vacate Special Master Order No. 28 ([Dkt. 1330](#)) and grant the ZHP Parties' motion for a protective order to preclude the deposition of Mr. Chen. This objection and motion to vacate Special Master Order No. 28 is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to Rule 53(f) of the Federal Rules of Civil Procedure and the applicable local rules of this Court.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the ZHP Parties shall rely on the accompanying Memorandum of Law in Support of the ZHP Parties' Objection to Special Master Order No. 28 Denying a Protective Order Precluding the Deposition of Baohua Chen.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested, pursuant to Fed. R. Civ. P. 53(f)(1), if this motion is opposed.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

July 13, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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